

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Jacqueline Fulton,)	C/A No. 2:21-cv-03023-DCN-MHC
)	
)	
	<i>Plaintiff,</i>)
)	
Versus)	LOCAL RULE 26.01 ANSWERS TO INTERROGATORIES
)	
Officer Travis M. Lanphere, City of North Charleston, and North Charleston Police Department,)	
)	
)	
	<i>Defendants.</i>)

Pursuant to Rule 26.01 of the Local Civil Rules for the United States District Court, District of South Carolina, Defendants, Officer Travis M. Lanphere, City of North Charleston, and North Charleston Police Department (hereinafter “Defendants”), by their undersigned attorneys, makes the following answers to Court ordered Interrogatories:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: Upon information and belief, none.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: The Defendants request a jury trial on all claims.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: Not Applicable to the Defendants.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See Local Civil Rule 3.01.*

ANSWER: **The alleged acts occurred in Charleston County, South Carolina. The allegations involve alleged claims of Section 1983 violations.**

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: **Upon information and belief, none.**

(F) [Defendants only.] If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: **The Defendants are properly identified.**

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: **The Defendants make no such contention at this time. The Defendants specifically reserve the right to supplement and/or change its Answers to these Interrogatories as discovery progresses in this case.**

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October 14, 2021

Charleston, South Carolina